

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
RICHARD E. WALKER	:	
	:	
Debtor	:	BANKRUPTCY NO. 22-10900 amc

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BKNY MELLON as trustee	:	
Movant	:	
DARIUS L. GREEN	:	
and KENNETH E. WEST	:	
Respondents	:	

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF BKNY MELLON**

Debtor, by and through Joseph F. Claffy, Esquire, his attorney, contests the Motion for Relief sought by BKNY MELLON as trustee and in support thereof avers the following:

1. Admitted.
2. Admitted.
3. Denied. Debtor has no knowledge of whether or not movant is in fact the mortgage holder and therefore must deny same demanding strict proof.
4. Admitted.
5. Admitted.
6. Admitted that co-debtor is a co-debtor. It is not admitted that there is jurisdiction over co-debtor without alleging a statutory basis therefore.
7. Admitted in part; denied in part. Admitted that three payments are due as of the date of this filing. Debtor was confused as to the amount due because the case had been dismissed and now reopened. Debtor has the money to catch up to September's payment and evidence of such will be available at the hearing hereupon.
8. Admitted, before the above referenced payment that figure is accurate.
9. Denied as a request for declaratory relief. Any movant which has the mortgage and note can foreclose should there be relief.
10. Denied.

11. Denied

12. Denied as a conclusion of law and ultimate fact.

13. Denied ore admitted in accord with applicable law.

WHEREFORE, respondent debtor requests that the court deny the motion.

Respectfully submitted:

/s/ Joseph F. Claffy  
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